
Facsimile Cover Sheet

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Date: April 26, 1999

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cover page:**

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Comments:

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April 26, 1999

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SUBMITTED BY FACSIMILE

Comments on Proposed Changes to
Forms MMS-3160, MMS-4054, MMS-
4055, MMS-4056, MMS-4058
64 FR 8844 (February 23, 1999)

Dear Mr. Guzy:

Exxon Company, U.S.A., a division of Exxon Corporation (Exxon) appreciates the opportunity to comment on MMS' proposed changes to production reporting.

In general, we appreciate the Minerals Management Service "MMS" working with industry to improve the reporting process. We recognize that you have made changes based upon industry's input. To the extent that there remain some issues, we offer the following comments and recommendations for your review. Please refer to the comments by the Council of Petroleum Accounting Societies for additional detail on the proposed changes.

General

Exxon supports the deletion of OGOR-C and combining it with OGOR-B. We also commend the MMS for simplifying the well status code and allowing payor's a choice with regard to the modification method for filing reports. Our remaining comments are listed below:

Oil and Gas Operations Report (OGOR), Form MMS-4054

Exxon suggests that the reporting requirement for GPM and Methane Mol % be deleted. Producers' accounting systems do not capture this data. For OCS Federal gas production, this is a significant reporting effort.



Gas Analysis Report (GAR), Form MMS-4055

Rather than reporting the GPM and Methane Mol % on the OGOR-B, Exxon recommends that this information be reported on the Gas Analysis Report (GAR) on an as-needed basis for offshore properties only.

Gas Plant Operators Report (GPOR), Form MMS-4056

The reference to "Field Btu" is rather confusing and appears to actually mean the Plan Inlet Btu. Exxon suggests that the name for this data element be changed to "Inlet Btu."

We agree with most of the changes made on these forms. Exxon appreciates the MMS reviewing our final recommendations as it proceeds toward improved reporting.

If you have any questions, please call me at (713) 680-7667 or Fred Watson at (713) 680-6796

W. L. Stone